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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

APR 18 2022

US DISTRICT COURT
MID DIST TENN

V. DAVIDSON COUNTY SHERIFF AND HIS MEDICAL
AGENTS Plaintiff(s), et al.

Case Number 22-00221

V. CITY OF NASHVILLE, TENNESSEE
NASHVILLE, TENNESSEE GOVERNMENT
CORRECT CARE SOLUTIONS AND SH
SELF Defendant(s).

Judge Aleta A. TRAUGER

Magistrate Judge _____

① MOTION TO AMEND THE SUIT AND LEAVE
NEW SUPPLEMENTAL PLEADINGS WITH THE COURTS LEAVE
UNDER Fed. R. CIV. P. RULE 15 (Type of Pleading) (a)(1)(A)(B), 15(a)(2), 15(b)(1), 15(d)

Comes now the plaintiff(s) with reasonable notice to the Court
to ask leave to Amend the suit Pleadings and parties under
Fed. R. Civ. P. Rule 15(a)(1)(A)(B), 15(a)(2), 15(b)(1), and 15(d), and
20(a)(1)(B)(E), Rule 23(a)(1)(2)(3)(4), 23(b)(2)(B), 23(b)(3), 20(a)(1)(B)(E),

② Motion to Have the Court order the Davidson County Sheriff
or his LEGAL Representatives to disclose to I, Harris, A. the full
names of all PATRIAL PRISONERS WHO FILED SUITS AGAINST THE
DAVIDSON COUNTY, SHERIFF OR HIS STAFF OR MEDICAL AGENCIES FROM 2015
TO 2022 OF TODAY,

③ MOTION TO HAVE THE COURT ORDER THE DAVIDSON COUNTY
SHERIFF AND HIS EMPLOYEES TO REMOVE ALL SEXUAL IMAGES OF
VAUGHN S. HARRIS, #78087, OUT OF THE D.C.S.O. COMPUTER
FILES AND DEVICES BECAUSE THESE IMAGES WERE NOT PART OF
A CRIME AND HAVE THE IMAGES GIVEN TO HARRIS IN COLOR OR DEED,

④ MOTION TO HAVE THE COURT ORDER THE DAVIDSON COUNTY
SHERIFF'S OFFICE CLASSIFICATION DIRECTOR REMOVE ALL THE

⑤ INCOMPATIBLE INMATES LISTED IN HARRIS'S INMATE CLASSIFICATION
BUT LEAVE HARRIS ON MANDATORY STATUS AND REC. ALONG STATUS

⑥ MOTION TO HAVE THE COURT ORDER THE COURT CLERK
TO PAGE NUMBER, FILE, AND INDEX ALL THE FOR I. HARRIS, OF
ALL THE PLAINTIFFS FILINGS IN THE COURT BECAUSE THE SHERIFF
AND HIS OFFICE TO DO SO ON 1/4/2022 AND 2/20/2022.

* Motion To PLEAD SUPPLEMENTAL PLEADINGS WITH
LEAVE OF COURT UNDER Federal RULES OF CIVIL PROCEDURE
RULE - 15(d) * MEMORANDUM OF LAW IN SUPPORT OF MOTION *

ON MOTION AND REASONABLE NOTICE, the court may, on just terms, permit a party to serve a supplemental pleading, setting out any transaction, occurrence, or event that happened after the date of the pleading to be supplemented. The court may permit supplementation even though the original pleading is defective in stating a claim or defense. The court may order that the opposing party plead to the supplemental pleading within a specified time.

* MOTION FOR PERMISSIVE JOINDER OF PARTIES UNDER

Federal Rules of Civil Procedure - Rule 20(a)(1)(A)+(B) (page 18)

This motion request the court to allow joinder of all ^{this suit and} injury lawsuits filed against the Metropolitan Government of Nashville and Davidson County, Tennessee and its ^{STAFF AND} agents from the year 2015 to 2019 or today, for injuries suffered from the defendants' execution of law ^(Tenn. Code Ann. 29-20-205) inflicted against them ^(plaintiffs) as abuse, ^{and tolling of the statute of limitations of these cases.}

* Motion For Certification of the CLASS IN THIS CLASS ACTION LAWSUIT

Under Federal Rules of Civil Procedure - Rule 23(a)(1),(2),(3),(4), (b)(2)(3), 23(b)(3)(A),(B),(C),(D) & 23(b)(1)(B)(3)(A),(B),(C),(D) * (page 18 AND 19) * MEMORANDUM OF LAW IN SUPPORT OF MOTION *

The certification order implicates a legal question about which there is a compelling need for immediate resolution. And the district court's decision is questionable, and the defendants deliberately withheld access to adequate legal materials from I, Harris, and other plaintiffs until the statute of limitations were exhausted by execution of the municipality's abuse policy, custom, and law, Tenn. Code Annotated 29-20-205, which frustrated, impeded, and impaired all class members' attempts to file a (non frivolous) class action in our original filings from 2015 up until today of 2019. The class consist of all pretrial prisoners of the Metropolitan Government of Nashville and Davidson County, Tennessee who were injured from 2015 until 2019 and into the future by the municipality, its policy makers, and its agents.

Federal Rules of Civil Procedure - Rules 15(c)(1)(A)(B)(C)(i)(ii)(2) AND 15(d) - continued

★ Fed. Rules Civil Procedure - Rule 15(c) ★ Relation Back of Amendments: ★

(1) When An Amendment Relates Back. An amendment to a pleading relates back to the date of the original pleading when:

(A) the law that provides the applicable statute of limitations allows relation back; (B) the amendment asserts a claim or defense that arose out of the conduct, transaction, or occurrence set out - or attempted to be set out - in the original pleading; or (C) the amendment changes the party or the naming of the party against whom a claim is asserted, if Rule 15(c)(1)(B) is satisfied and if within the period provided by Rule 4(m) for serving the summons and complaint, the party to be brought in by amendment: (i) received such notice of the action that it will not be prejudiced in defending on the merits; and (ii) knew or should have known that the action would have been brought against it, but for a mistake concerning the proper party's identity.

(2) Notice to the United States. When the United States or a United States officer or agency is added as a defendant by amendment, the notice requirements of Rule 15(c)(1)(C)(i) and (ii) are satisfied if, during the stated period, process was delivered or mailed to the United States Attorney's designee, to the Attorney General of the United States, or to the officer or agency. ★ Fed. Rules Civil Procedure - Rule 15(d) ★ ^{SUPPLEMENTAL} PLEADINGS ★

★ (d) SUPPLEMENTAL PLEADINGS. ON motion and reasonable notice, the court may, on just terms, permit a party to serve a supplemental pleading setting out any transaction, occurrence, or event that happened after the date of the pleading to be supplemented. The court may permit supplementation even though the original pleading is defective in stating a claim or defense. The court may order that the opposing party plead to the supplemental pleading within a specified time. (Amended 1-21-1963, effective 7-1-1963; 2-28-1966, effective 7-1-1966; 3-2-1987, effective 8-1-1987; 4-30-1991, effective 12-1-1991; amended by Pub. L. 102-198, 511, 12-9-1991, 105 Stat. 1626; amended 4-22-1993, effective 12-1-1993; 4-30-2007, effective 12-1-2007; 3-26-2009, effective 12-1-2009)

12/2/22
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

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APR 18 2022

US DISTRICT COURT
MID DIST TENN

Plaintiff/Petitioner

Civil Action No. 3:22-cv-00221

Defendant/Respondent

APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS
(Short Form – FOR PRISONERS ONLY)

IMPORTANT NOTE FOR ALL PRISONER APPLICANTS: Your Application must be signed where indicated by an officer at the institution where you are confined verifying the amount of money you have on deposit at that institution. The officer's signature must be notarized in accordance with Administrative Order No. 93.

IN ADDITION, *unless you are filing a petition for habeas corpus under 28 U.S.C. §§ 2241, 2254, or 2255, YOU MUST SUBMIT A CERTIFIED COPY OF YOUR TRUST FUND ACCOUNT STATEMENT (OR INSTITUTIONAL EQUIVALENT) FOR THE 6-MONTH PERIOD IMMEDIATELY PRECEDING THE FILING OF YOUR COMPLAINT OR NOTICE OF APPEAL, OBTAINED FROM THE APPROPRIATE OFFICIAL OF EACH PRISON AT WHICH YOU ARE OR WERE CONFINED.*

I declare under penalty of perjury that I am a plaintiff or petitioner in this case; I believe I am entitled to the relief requested; and I am unable to pay the costs of these proceedings.

In further support of this application, I answer the following questions under penalty of perjury:

1. I am being held at: DOWNTOWN

2. If I am employed at the institution where I am incarcerated, my gross pay or wages are: \$ 0.00 per (specify pay period) 0.00 (i.e., per week, two weeks, month).

3. *Other Income.* In the past 12 months, I have received income from the following sources (check all that apply):

(a) Business, profession, or other self-employment	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(b) Rent payments, interest, or dividends	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(c) Pension, annuity, or life insurance payments	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(d) Disability, or worker's compensation payments	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(e) Gifts, or inheritances	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
(f) Any other sources	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.

a rel. from my mom

4. Total amount of money that I have in cash or in all checking and savings accounts: \$ 0

5. All automobiles, real estate, stocks, bonds, securities, trusts, jewelry, art work, and other financial instruments and things of value that I own, including any item of value held in someone else's name (*describe the property and its approximate value*):

6. All housing, transportation, utilities, loan payments, and other regular monthly expenses (*describe and provide the amount of the monthly expense*):

7. Names (or, if under 18, initials only) of all persons who are dependent on me for support, my relationship with each person, and how much I contribute to their support:

8. All debts and financial obligations (*describe the amounts owed and to whom they are payable*):

Declaration: I declare under penalty of perjury that the above information is true, and I understand that a false statement may result in a dismissal of my claims.

Date: 3-2-22

[Signature]
Applicant's signature

[Printed Name]
Printed name

CERTIFICATE

TO BE COMPLETED BY WARDEN OR APPROPRIATE OFFICER OF INSTITUTION

I, Walter Robinson, being an authorized staff member for DCSO [name of facility] certify that inmate Vaughn Harris has the total sum of \$ 0.00 in his trust fund account at this facility. I hereby further certify that this inmate's trust fund average balance for the past six months has been \$ 0.00.

[Signature]
Signature of Authorized Officer at the Institution

Sworn and subscribed before me this the 2 day of March, 2022

[Signature]
Notary Public

My Commission Expires: 11-8-22

